

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
THOMAS HIDALGO and GISSELL VENTURA,

VERIFIED COMPLAINT

Plaintiff(s),

Index No:

-against-

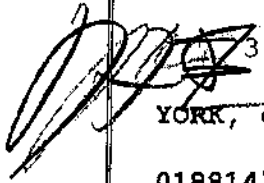
CITY OF NEW YORK, NEW YORK CITY POLICE
OFFICER JEREMY VEIT (Shield # 018814),
NEW YORK CITY POLICE OFFICER BRIAN
DONOGHUE (Tax ID # 806137), NEW YORK CITY
POLICE OFFICER "JOHN DOE # 1", NEW YORK
CITY POLICE OFFICER "JOHN DOE # 2", NEW
YORK CITY POLICE OFFICER "JOHN DOE # 3",
NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 5", NEW YORK CITY POLICE OFFICER
"JOHN DOE # 6", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 7" and NEW YORK CITY
POLICE OFFICER "JOHN DOE # 8",

Defendant(s).
-----X

Plaintiffs, by and through their attorneys, BELOVIN &
FRANZBLAU, LLP, as and for a verified complaint, respectfully
allege as follows:

1. That all the times hereinafter mentioned, plaintiffs
were, and still are, residents of the City and State of New York,
County of Bronx.

2. At all the times herein, the defendant, CITY OF NEW YORK,
was, and still is a duly licensed Municipal Corporation authorized
to transact business in the City of New York, County of Bronx.

 3. Upon information and belief, the defendant, CITY OF NEW YORK, employed NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", who were herein duly employed and acting New York City Police Officers (or other ranking officers) of the City of New York, County of Bronx, State of New York and upon information and belief, the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were and still are, at all times herein mentioned, residents of the City and State of New York.

4. Upon information and belief, that all times herein, the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were and still are employees of The City of New York Police Department as Police Officers (or other ranking officers), and were at all times herein acting within the furtherance and scope of their employment with THE CITY OF NEW YORK. The defendant, CITY OF NEW YORK, is liable and responsible for all of those acts committed by the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", pursuant to the doctrine of

respondeat superior. THE CITY OF NEW YORK expressly and implicitly condoned all of the actions of NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", set forth herein and hereinafter.

5. Upon information and belief, THE CITY OF NEW YORK at all times herein, condoned all of the acts of the defendant, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", as herein and hereinafter set forth.

Upon information and belief, each and all of the acts of the defendants alleged herein were done by defendants, and each of

them, both as individuals, and under the color and pretense of the statutes, ordinances, regulations, customs and usages of the State of New York, City of New York and the County of New York, and under the authority of their office as Police Officers for New York City.

7. Upon information and belief, that on or about October, 2011 at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, although the plaintiffs were lawfully and properly at said premises (their residence), they were forcibly, violently and unlawfully assaulted and battered, threatened and illegally placed under arrest and imprisoned by the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", working for and on behalf of THE CITY OF NEW YORK.

8. Upon information and belief the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE

OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", unlawfully accused the plaintiffs of crimes and violations and the defendants became abusive toward the plaintiffs without any justification and said accusations were completely false and plaintiffs were unlawfully placed under arrest.


Upon information and belief, the plaintiffs were taken to the New York City Police Department 48th Precinct and thereafter to Central Booking, Bronx, New York and were held, under arrest, and imprisoned from approximately October 6, 2011 at approximately 6:45 a.m. until October 7, 2011.

10. Upon information and belief, during the time the plaintiffs were unlawfully held at the aforesaid locations, plaintiffs were otherwise forced to undergo great emotional and mental anguish and physical harm, and loss of liberty and freedom and were kept and imprisoned in various cells and handcuffed.


11. Upon information and belief, that on October 7, 2011, the plaintiffs were released and advised that they were free to go.

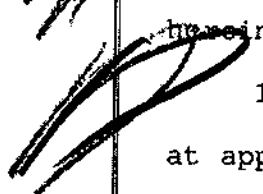
12. Upon information and belief, all criminal charges were dismissed against the plaintiffs in connection with, or in support

of the arrest, search, seizure and imprisonment to which plaintiffs were subject as set forth herein.

 13. Prior to the commencement of this action, on the 11th day of December, 2011, a Notice of Claim, for each plaintiff, was duly served herein on the defendant. Thereafter, on the 31st day of July, 2012, the City of New York, conducted 50-H hearings of both plaintiffs pursuant to the General Municipal Law. That more than thirty days have expired since the filing of the Notice of Claims, and the defendants have failed and neglected to adjust the claims. This action is timely brought.

AS AND FOR A FIRST CAUSE OF ACTION AGAINST THE DEFENDANTS
CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT
(Shield # 018814), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1,
NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY
POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 7", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW
YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF PLAINTIFF,
THOMAS HIDALGO

 14. Plaintiffs repeat, reiterate and reallege each and every allegation numbered "1" through "13", above as if fully set forth herein.

 15. Upon information and belief, on or about October 6, 2011 at approximate 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, THOMAS HIDALGO, was lawfully and properly inside said premises (his

residence), the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", approached the plaintiff, detained him and began to assault and search the plaintiff. This detainment was conducted in a violent and abusive manner during the course of which defendant probed and shoved plaintiff, cuffed and verbally and assaulted, battered and abused plaintiff with the intent and purpose of harming, humiliating and embarrassing plaintiff in the presence of the public generally, and particularly, the people present at the scene.

16. Upon information and belief, after searching plaintiff's person, as above described, which search did not reveal any incriminatory or dangerous articles defendant placed the plaintiff in handcuffs and compelled the plaintiff to accompany them to and detained at the following locations: the 48th Precinct and Central Booking, Bronx, New York.

17. Upon information and belief, plaintiff was held at the above locations and imprisoned therein, and detained, from approximately October 6, 2011 at 6:45 a.m. until October 7, 2011. Said imprisonment and confinement was all without probable cause or justification and was all precipitated by the unlawful and improper charges and actions of the New York City Police Department and their employees and said actions of defendants were done intentionally and with malice. In addition, plaintiff was also subjected to an improper and humiliating strip search.

18. Upon information and belief, all criminal charges and violations pressed against plaintiff in connection with, or in support of the arrest, search, seizure, and imprisonment to which plaintiff was subjected as set forth herein were dismissed and were unjustified and said confinement was, at all times, against the will of the plaintiff. That plaintiff was aware of said imprisonment and confinement and did not consent thereto. The confinement and imprisonment was not privileged.

19. Upon information and belief, said confinement and imprisonment was without probable cause, was improper and without justification and the plaintiff, **THOMAS HIDALGO's** movements were restricted. This confinement, imprisonment and restriction of the plaintiff's movement was against his will and plaintiff was aware of said confinement, restriction and imprisonment.

20. Upon information and belief, by the reason of the aforesaid **FALSE IMPRISONMENT** of the plaintiff, **THOMAS HIDALGO**, by the defendants, the plaintiff sustained physical, mental and emotional injuries, humiliation, loss of esteem, loss of liberty, loss of freedom, loss of time, loss of enjoyment of life, and is entitled to punitive damages, against **NEW YORK CITY POLICE OFFICER JEREMY VEIT** (Shield # 018814), **NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE** (Tax ID # 806137), **NEW YORK CITY POLICE OFFICER "JOHN DOE # 1"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 2"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 3"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 4"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 5"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 6"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 7"** and **NEW YORK CITY POLICE OFFICER "JOHN DOE # 8"**, and was otherwise injured an amount exceeding the jurisdictional limits of all lower Courts.

AS AND FOR A SECOND CAUSE OF ACTION AGAINST DEFENDANTS
CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT
(Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE
(Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1",
NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY
POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON
BEHALF OF PLAINTIFF, THOMAS HIDALGO

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21. Plaintiffs repeat, reiterate and reallege each and every allegation number "1" through "20" above, as if fully set forth herein.

22. Upon information and belief, on or about October 6, 2011 at approximately 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, THOMAS HIDALGO, was lawfully and properly inside said premises (his residence), the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7"

and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did falsely arrest the plaintiff.

23. Upon information and belief, at all times herein, the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did assert proper legal authority to detain and arrest the plaintiff, and the plaintiff reasonably believed that the defendants did have the power to hold him against his will.

24. Upon information and belief, said arrest was without probable cause, improper and without justification, and the plaintiff, THOMAS HIDALGO's, movement was restricted and confined.

25. Upon information and belief, the aforesaid arrest and restriction of plaintiff's movements was against his will and plaintiff was aware of said arrest and restrictions and confinement against his will.

26. Upon information and belief, said arrest was improper, unlawful and without proper justification and without probable cause.

27. Upon information and belief, at all times herein, the aforesaid false arrest by the defendants was made with malice and the defendants did intend to falsely arrest the plaintiff.

28. Upon information and belief, by reason of the FALSE ARREST of the plaintiff, THOMAS HIDALGO, by the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the plaintiff sustained physical, mental and emotional injuries, humiliation, loss of esteem, loss of liberty, loss of time, loss of enjoyment of life and is entitled to punitive damages against NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW

YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and was otherwise damaged all an amount exceeding the jurisdictional limits of all lower Courts.

AS AND FOR A THIRD CAUSE OF ACTION AGAINST DEFENDANTS
CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT
(Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE
(Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1",
NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY
POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON
BEHALF OF PLAINTIFF, THOMAS HIDALGO

29. Plaintiffs repeat, reiterate and reallege each and every allegation numbered "1" through "28", above as if fully set forth hereinafter.

30. Upon information and belief, the defendant, CITY OF NEW YORK, owed a duty to the general public to sufficiently train and educate their police officers.

31. Upon information and belief, the aforesaid police officers, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK

CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were not sufficiently trained and experienced in carrying out their duties as New York City Police Officers. In addition, upon information and belief, the defendant, CITY OF NEW YORK, was further negligent in hiring and retaining NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", as employees despite having actual and or constructive notice that said employees were unfit and not qualified to carry out their duties as Police Officers, and possessed violent propensities.

32. Upon information and belief, that THE CITY OF NEW YORK was negligent, careless and reckless in not sufficiently training their police officers and that all of the aforesaid defendants did

not perform a proper investigation before committing the aforesaid conduct, and in negligently hiring and retaining defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and the defendants were otherwise negligent.

33. That as a direct and proximate result of the defendant, THE CITY OF NEW YORK negligence, including, but not limited to: Their failure to properly and adequately train their police officers, and of the negligence of the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER

"JOHN DOE # 8", all of the aforesaid tortious conduct was committed upon the plaintiff causing him serious and severe physical and emotional injuries.

34. By reason of the aforesaid NEGLIGENCE of defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the plaintiff, THOMAS HIDALGO, did suffer shock, mental distress, emotional stress, material loss, emotional damages, loss of esteem, humiliation, loss of enjoyment of life, loss of liberty, loss of time and physical damage, all in an amount exceeding the jurisdictional limits of all lower Courts.

AS AND FOR A FOURTH CAUSE OF ACTION AGAINST DEFENDANTS CITY OF
NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield #
018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID #
806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK
CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER
"JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW
YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE #
7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF
PLAINTIFF, THOMAS HIDALGO

35. Plaintiffs repeat, reiterate and reallege each and every
allegation numbered "1" through "34", above as if fully set forth
hereinafter.

36. Upon information and belief, during all the times herein,
the individual defendants, and each of them, separately and in
concert, acted under the cover of law and statutes, ordinances,
regulations, customs and usages of the State of New York, County of
Bronx, City of New York.

37. Upon information and belief, each of the defendants,
separately and in concert engaged in illegal conduct herein
mentioned to the injury of the plaintiff and deprived plaintiff of
the rights, privileges and immunities, secured to the plaintiff by
the constitution of the United States, and Federal Laws of the
United States. The defendants, in imprisoning and arresting the
plaintiff deprived the plaintiff of his constitutional rights and
annuities secured by the United States Constitution and freedom
from illegal seizure, illegal search, fear from legal detention,

coercion and intimidation, all secured by the Constitution of the United State and 42 United States Code Section 1983. The defendants acted knowingly and purposely with the specific intention to deprive the plaintiff of his aforementioned rights.

38. Upon information and belief, that all the actions set forth herein by various officers of the New York City Police Department, Bronx County, constitute a continuing pattern of harassment toward plaintiff, demanding the compensation of significant damages and punitive damages, as plaintiff's life has been extremely disrupted by this pattern of abuse.

39. Upon information and belief, the actions and conduct described herein by NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and the New York City Police Department constituted and demonstrates an official unconstitutional policy and custom of abuse and misconduct by the New York City Police Department, NEW YORK CITY POLICE OFFICER

JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", constituted a continuing pattern of abuse and misconduct by the New York City Police Department, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and said misconduct and official unconstitutional policy caused plaintiff to be subjected to and deprived his constitutional rights.

40. Upon information and belief, at all times herein, the defendant, CITY OF NEW YORK, condoned the above unconstitutional conduct by its police officers as is demonstrated by the substantial and reoccurring amount of 42 USC § 1983 claims filed

against the CITY OF NEW YORK and this official New York City unconstitutional pattern of behavior has been demonstrated and documented on several occasions by both the New York City Police and other investigations.

41. Upon information and belief, as a direct and proximate result of the aforesaid, the plaintiff suffered physical and mental injuries and anguish, public scorn, humiliation, loss of esteem, loss of liberty, loss of time, loss of enjoyment of life, and the plaintiff was otherwise damaged, all in an amount exceeding the jurisdictional limits of all lower Courts.

42. Plaintiff hereby demands reasonable attorneys fees pursuant to 42 United State Code Section 1983 and other Civil Rights Statutes.

AS AND FOR A FIFTH CAUSE OF ACTION AGAINST DEFENDANTS CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF PLAINTIFF, THOMAS HIDALGO

43. Plaintiffs repeat, reiterate and realleges each and every allegation numbered "1" through "42", above as if fully set forth hereinafter.

44. Upon information and belief, on or about October 6, 2011 at approximate 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, THOMAS HIDALGO, was lawfully and properly inside the premises (his residence), the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", civilly assaulted the plaintiff, THOMAS HIDALGO.

45. Upon information and belief, at all times herein, the defendant, CITY OF NEW YORK, and the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK

CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", placed the plaintiff, THOMAS HIDALGO, in imminent fear of violent contact.

46. Upon information and belief, the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", acts were intentional and made with malice all against the plaintiff, THOMAS HIDALGO.

47. Upon information and belief, at all times herein, the plaintiff was aware of the defendants actions, and the plaintiff was aware of the fear and threat of the imminent offensive violent contact.

48. Upon information and belief, by reason of CIVIL ASSAULT of the plaintiff, THOMAS HIDALGO, by the aforesaid defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY

POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", THOMAS HIDALGO, sustained serious and severe personal injury, physical, mental and emotional injuries and plaintiff demands punitive damages and was otherwise damaged in an amount exceeding the jurisdictional limits of all lower Courts and demands punitive damages against NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8".

AS AND FOR A SIXTH CAUSE OF ACTION AGAINST DEFENDANTS
CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT
(Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE
(Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1",
NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY
POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON
BEHALF OF PLAINTIFF, THOMAS HIDALGO

49. Plaintiffs repeat, reiterate and reallege each and every allegation numbered "1" through "48", above as if fully set forth hereinafter.

50. Upon information and belief, on or about October 6, 2011 at approximately 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, THOMAS HIDALGO, was lawfully and properly inside said premises (his residence), the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7"

and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", civilly battered the plaintiff, THOMAS HIDALGO.

51. That at the aforesaid time and place the defendant, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did batter the plaintiff by subjecting the plaintiff, THOMAS HIDALGO, to offensive bodily conduct.

52. Upon information and belief, the plaintiff, THOMAS HIDALGO, never consented to said contact, nor was said contact justified or privileged.

53. Upon information and belief, the aforesaid battery by the defendants upon the plaintiff was made intentionally and with malice, all against the plaintiff's will, and the plaintiff was fully aware of said battery.

54. Upon information and belief, by reason of the CIVIL BATTERY of the plaintiff, THOMAS HIDALGO, by the defendants, CITY

OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the plaintiff, THOMAS HIDALGO, sustained serious and severe personal, physical, mental and emotional injuries, and plaintiff demand punitive damages, and was otherwise damaged all in an amount exceeding the jurisdictional limits of all lower Courts and plaintiff demands punitive damages against NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8".

AS AND FOR A SEVENTH CAUSE OF ACTION AGAINST DEFENDANTS, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF PLAINTIFF, THOMAS HIDALGO

55. Plaintiffs repeat, reiterate and reallege each and every allegation numbered "1" through "54", above as if fully set forth hereinafter.

56. Upon information and belief, on or about October 6, 2011 at approximate 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, THOMAS HIDALGO, was lawfully and properly inside said premises (his residence), the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did intentionally

inflict emotional harm upon the plaintiff, THOMAS HIDALGO and/or acted with a complete disregard of the substantial probability of causing severe emotional distress to plaintiff, THOMAS HIDALGO.

57. Upon information and belief, that at the aforesaid time and place the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did batter and assault the plaintiff in the presence of the public in an effort to humiliate and otherwise intimidate and embarrass plaintiff by subjecting the plaintiff, THOMAS HIDALGO, to offensive bodily conduct.

58. Upon information and belief, the plaintiff, THOMAS HIDALGO, never consented to said contact, nor was said contact justified or privileged.

59. Upon information and belief, the aforesaid intentional infliction of emotional harm by the defendants upon the plaintiff

was made intentionally and with malice, all against the plaintiff's will, and the plaintiff was fully aware of same.

60. Upon information and belief, the actions performed by defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were so shocking and outrageous that they exceeded all reasonable bounds of decency and constituted extreme and outrageous conduct.

61. Upon information and belief, there was a causal connection between the outrageous conduct described herein by defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN

DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and plaintiff, THOMAS HIDALGO's severe emotional distress and injuries.

62. Upon information and belief, the above actions conducted by the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" caused severe emotional distress to plaintiff.


63. Upon information and belief, the above actions of defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were done with the desire to cause such severe stress to plaintiff under

circumstances known to defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", which made it substantially certain that the result would follow and acted recklessly with utter disregard of the consequences that might follow.

64. Upon information and belief, by reason of the INTENTIONAL INFLICTION OF EMOTIONAL HARM of the plaintiff, THOMAS HIDALGO, by the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the plaintiff, THOMAS HIDALGO, sustained serious and severe personal,

physical, mental and emotional injuries, and plaintiff demand punitive damages, and was otherwise damaged all in an amount exceeding the jurisdictional limits of all lower Courts and plaintiff demands punitive damages against NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8".

AS AND FOR AN EIGHTH CAUSE OF ACTION AGAINST THE DEFENDANTS CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF PLAINTIFF, GISSELL VENTURA

 65. Plaintiffs repeat, reiterate and reallege each and every allegation numbered "1" through "64", above as if fully set forth herein.

56. Upon information and belief, on or about October 6, 2011 at approximately 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D,, City and State of New York, County of Bronx, while the plaintiff, **GISSELL VENTURA**, was lawfully and properly inside said premises, her residence, the defendant, **CITY OF NEW YORK**, by and through their employees, defendants, **NEW YORK CITY POLICE OFFICER JEREMY VEIT** (Shield # 018814), **NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE** (Tax ID # 806137), **NEW YORK CITY POLICE OFFICER "JOHN DOE # 1"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 2"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 3"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 4"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 5"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 6"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 7"** and **NEW YORK CITY POLICE OFFICER "JOHN DOE # 8"**, approached the plaintiff, detained her and began to assault and search the plaintiff. This search was conducted in a violent and abusive manner during the course of which defendant probed and shoved plaintiff, cuffed and verbally and assaulted, battered and abused plaintiff with the intent and purpose of harming, humiliating and embarrassing plaintiff in the presence of the public generally, and particularly, the people present at the scene.

67. Upon information and belief, after searching plaintiff's person, as above described, which search did not reveal any incriminatory or dangerous articles defendant placed the plaintiff in handcuffs and compelled the plaintiff to accompany them to and detained at the following locations: the 43rd Precinct and Central Booking, Bronx, New York.

68. Upon information and belief, plaintiff was held at the above locations and imprisoned therein, and detained, from approximately October 6, 2011 at 6:45 a.m. until October 7, 2011. Said imprisonment and confinement was all without probable cause or justification and was all precipitated by the unlawful and improper charges and actions of the New York City Police Department and their employees and said actions of defendants were done intentionally and with malice.

69. Upon information and belief, all criminal charges and violations pressed against plaintiff in connection with, or in support of the arrest, search, seizure, and imprisonment to which plaintiff was subjected as set forth herein were dismissed and were unjustified and said confinement was, at all times, against the will of the plaintiff. That plaintiff was aware of said imprisonment and confinement and did not consent thereto. The confinement and imprisonment was not privileged.

70. Upon information and belief, said confinement and imprisonment was without probable cause, was improper and without justification and the plaintiff, **GISELL VENTURA**'s movements were restricted. This confinement, imprisonment and restriction of the plaintiff's movement was against her will and plaintiff was aware of said confinement, restriction and imprisonment.

71. Upon information and belief, by the reason of the aforesaid **FALSE IMPRISONMENT** of the plaintiff, **GISELL VENTURA**, by the defendants, the plaintiff sustained physical, mental and emotional injuries, humiliation, loss of esteem, loss of liberty, loss of freedom, loss of time, loss of enjoyment of life, and is entitled to punitive damages, against **NEW YORK CITY POLICE OFFICER JEREMY VEIT** (Shield # 018814), **NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE** (Tax ID # 806137), **NEW YORK CITY POLICE OFFICER "JOHN DOE # 1"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 2"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 3"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 4"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 5"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 6"**, **NEW YORK CITY POLICE OFFICER "JOHN DOE # 7"** and **NEW YORK CITY POLICE OFFICER "JOHN DOE # 8"**, and was otherwise injured an amount exceeding the jurisdictional limits of all lower Courts.

AS AND FOR A NINTH CAUSE OF ACTION AGAINST DEFENDANTS
CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT
(Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE
(Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1",
NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY
POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON
BEHALF OF PLAINTIFF, GISELL VENTURA

72. Plaintiffs repeat, reiterate and reallege each and every allegation number "1" through "71" above, as if fully set forth herein.

73. Upon information and belief, on or about October 6, 2011 at approximately 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, GISELL VENTURA, was lawfully and properly inside said premises, her residence, the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN

DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did falsely arrest the plaintiff.

74. Upon information and belief, at all times herein, the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", did assert proper legal authority to detain and arrest the plaintiff, and the plaintiff reasonably believed that the defendants did have the power to hold her against her will.

75. Upon information and belief, said arrest was without probable cause, improper and without justification, and the plaintiff, GISSELL VENTURA's, movement was restricted and confined.

76. Upon information and belief, the aforesaid arrest and restriction of plaintiff's movements was against her will and plaintiff was aware of said arrest and restrictions and confinement against her will.

77. Upon information and belief, said arrest was improper, unlawful and without proper justification and without probable cause.

78. Upon information and belief, at all times herein, the aforesaid false arrest by the defendants was made with malice and the defendants did intend to falsely arrest the plaintiff.

80. Upon information and belief, by reason of the FALSE ARREST of the plaintiff, GISSELL VENTURA, by the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the plaintiff sustained physical, mental and emotional injuries, humiliation, loss of esteem, loss of liberty, loss of time, loss of enjoyment of life and is entitled to punitive damages against NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW

YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and was otherwise damaged all an amount exceeding the jurisdictional limits of all lower Courts.

AS AND FOR A TENTH CAUSE OF ACTION AGAINST DEFENDANTS
CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT
(Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE
(Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1",
NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE #
4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY
POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN
DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON
BEHALF OF PLAINTIFF, GISELL VENTURA

178 81. Plaintiffs repeat, reiterate and reallege each and every allegation numbered "1" through "80", above as if fully set forth hereinafter.

82. Upon information and belief, the defendant, CITY OF NEW YORK, owed a duty to the general public to sufficiently train and educate their police officers.

83. Upon information and belief, the aforesaid police officers, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK

CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were not sufficiently trained and experienced in carrying out their duties as New York City Police Officers. In addition, upon information and belief, the defendant, CITY OF NEW YORK, was further negligent in hiring and retaining NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", as employees despite having actual and or constructive notice that said employees were unfit and not qualified to carry out their duties as Police Officers, and possessed violent propensities.

84. Upon information and belief, that THE CITY OF NEW YORK was negligent, careless and reckless in not sufficiently training their police officers and that all of the aforesaid defendants did

not perform a proper investigation before committing the aforesaid conduct, and in negligently hiring and retaining defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and the defendants were otherwise negligent.

85. That as a direct and proximate result of the defendant, THE CITY OF NEW YORK negligence, including, but not limited to: Their failure to properly and adequately train their police officers, and of the negligence of the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER

"JOHN DOE # 8", all of the aforesaid tortious conduct was committed upon the plaintiff causing her serious and severe physical and emotional injuries.

86. By reason of the aforesaid NEGLIGENCE of defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the plaintiff, GISSELL VENTURA, did suffer shock, mental distress, emotional stress, material loss, emotional damages, loss of esteem, humiliation, loss of enjoyment of life, loss of liberty, loss of time and physical damage, all in an amount exceeding the jurisdictional limits of all lower Courts.

AS AND FOR AN ELEVENTH CAUSE OF ACTION AGAINST DEFENDANTS CITY OF
NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield #
018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID #
806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK
CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER
"JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW
YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE
OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE #
7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF
PLAINTIFF, GISELL VENTURA

178 87. Plaintiffs repeat, reiterate and reallege each and every
allegation numbered "1" through "86", above as if fully set forth
hereinafter.

188- 88. Upon information and belief, during all the times herein,
the individual defendants, and each of them, separately and in
concert, acted under the cover of law and statutes, ordinances,
regulations, customs and usages of the State of New York, County of
Bronx, City of New York.

189. 89. Upon information and belief, each of the defendants,
separately and in concert engaged in illegal conduct herein
mentioned to the injury of the plaintiff and deprived plaintiff of
the rights, privileges and immunities, secured to the plaintiff by
the constitution of the United States, and Federal Laws of the
United States. The defendants, in imprisoning and arresting the
plaintiff deprived the plaintiff of her constitutional rights and
annuities secured by the United States Constitution and freedom
from illegal seizure, illegal search, fear from legal detention,

coercion and intimidation, all secured by the Constitution of the United State and 42 United States Code Section 1983. The defendants acted knowingly and purposely with the specific intention to deprive the plaintiff of her aforementioned rights.

90. Upon information and belief, that all the actions set forth herein by various officers of the New York City Police Department, Bronx County, constitute a continuing pattern of harassment toward plaintiff, demanding the compensation of significant damages and punitive damages, as plaintiff's life has been extremely disrupted by this pattern of abuse.

91. Upon information and belief, the actions and conduct described herein by NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and the New York City Police Department constituted and demonstrates an official unconstitutional policy and custom of abuse and misconduct by the New York City Police Department, NEW YORK CITY POLICE OFFICER

JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", constituted a continuing pattern of abuse and misconduct by the New York City Police Department, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and said misconduct and official unconstitutional policy caused plaintiff to be subjected to and deprived her constitutional rights.

92. Upon information and belief, at all times herein, the defendant, CITY OF NEW YORK, condoned the above unconstitutional conduct by its police officers as is demonstrated by the substantial and reoccurring amount of 42 USC § 1983 claims filed

against the CITY OF NEW YORK and this official New York City unconstitutional pattern of behavior has been demonstrated and documented on several occasions by both the New York City Police and other investigations.

93. Upon information and belief, as a direct and proximate result of the aforesaid, the plaintiff suffered physical and mental injuries and anguish, public scorn, humiliation, loss of esteem, loss of liberty, loss of time, loss of enjoyment of life, and the plaintiff was otherwise damaged, all in an amount exceeding the jurisdictional limits of all lower Courts.

94. Plaintiff hereby demands reasonable attorneys fees pursuant to 42 United State Code Section 1983 and other Civil Rights Statutes.

AS AND FOR A TWELFTH CAUSE OF ACTION AGAINST DEFENDANTS CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" ON BEHALF OF PLAINTIFF, GISSELL VENTURA

95. Plaintiffs repeat, reiterate and realleges each and every allegation numbered "1" through "94", above as if fully set forth hereinafter.

96. Upon information and belief, on or about October 6, 2011 at approximately 6:45 a.m. at 2134 Vyse Avenue, Apartment 2D, City and State of New York, County of Bronx, while the plaintiff, GISELL VENTURA, was lawfully and properly inside the premises, the defendant, CITY OF NEW YORK, by and through their employees, defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", civilly assaulted the plaintiff, GISELL VENTURA.

97. Upon information and belief, at all times herein, the defendant, CITY OF NEW YORK, and the defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK

CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", placed the plaintiff, GISSELL VENTURA, in imminent fear of violent contact.

98. Upon information and belief, the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" acts were intentional and made with malice all against the plaintiff, GISSELL VENTURA.

99. Upon information and belief, at all times herein, the plaintiff was aware of the defendants actions, and the plaintiff was aware of the fear and threat of the imminent offensive violent contact.

100. Upon information and belief, by reason of CIVIL ASSAULT of the plaintiff, GISSELL VENTURA, by the aforesaid defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY

was made intentionally and with malice, all against the plaintiff's will, and the plaintiff was fully aware of same.

112. Upon information and belief, the actions performed by defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were so shocking and outrageous that they exceeded all reasonable bounds of decency and constituted extreme and outrageous conduct.

113. Upon information and belief, there was a causal connection between the outrageous conduct described herein by defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN

DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", and plaintiff, GISSELL VENTURA's severe emotional distress and injuries.

114. Upon information and belief, the above actions conducted by the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", caused severe emotional distress to plaintiff.

115. Upon information and belief, the above actions of defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", were done

with the desire to cause such severe stress to plaintiff under circumstances known to defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", which made it substantially certain that the result would follow and acted recklessly with utter disregard of the consequences that might follow.

116. Upon information and belief, by reason of the INTENTIONAL INFLECTION OF EMOTIONAL HARM of the plaintiff, GISSELL VENTURA, by the defendants, CITY OF NEW YORK, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", the

plaintiff, GISELL VENTURA, sustained serious and severe personal, physical, mental and emotional injuries, and plaintiff demand punitive damages, and was otherwise damaged all in an amount exceeding the jurisdictional limits of all lower Courts and plaintiff demands punitive damages against NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8".

WHEREFORE, plaintiff demands judgement against the defendants jointly and severally, in an amount exceeding the jurisdictional limits of all lower Courts on the First Cause of Action and in amount exceeding the jurisdictional limits of all lower Courts on the Second Cause of Action and in amount exceeding the jurisdictional limits of all lower Courts on the Third Cause of Action and in amount exceeding the jurisdictional limits of all lower Courts on the Fourth Cause of Action and in amount exceeding the jurisdictional limits of all lower Courts on the Fifth Cause of

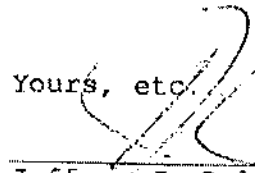
Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Sixth Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Seventh Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Eighth Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts and the Ninth Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Tenth Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Eleventh Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Twelfth Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on Thirteenth Cause of Action and in an amount exceeding the jurisdictional limits of all lower Courts on the Fourteenth Cause of Action plus punitive damages against defendants, NEW YORK CITY POLICE OFFICER JEREMY VEIT (Shield # 018814), NEW YORK CITY POLICE OFFICER BRIAN DONOGHUE (Tax ID # 806137), NEW YORK CITY POLICE OFFICER "JOHN DOE # 1", NEW YORK CITY POLICE OFFICER "JOHN DOE # 2", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY

POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8"

NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 3", NEW YORK CITY POLICE OFFICER "JOHN DOE # 4", NEW YORK CITY POLICE OFFICER "JOHN DOE # 5", NEW YORK CITY POLICE OFFICER "JOHN DOE # 6", NEW YORK CITY POLICE OFFICER "JOHN DOE # 7", NEW YORK CITY POLICE OFFICER "JOHN DOE # 8" and NEW YORK CITY POLICE OFFICER "JOHN DOE # 8", in the amount exceeding the jurisdictional limits of all lower Courts together with costs, interest and disbursements of this action, and together with such other and further relief as to this Court may seem just and proper.

Dated: Bronx, New York
December 4, 2012

Yours, etc.


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